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May 2, 2006

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: State Actions to Achieve Effective Deployment  
Of E911 Capabilities for Multi-Line Telephone  
Systems (MLTS), CC Docket 94-102 (DA 04-3874)

Ex parte communication pursuant to Section 1.1206.

Dear Ms. Dortch :

By Public Notice of December 10, 2004 (DA 04-3874), the FCC sought public comment on the progress being made by the states in implementing E911<sup>1</sup> solutions for multi-line telephone systems (MLTSs). In Comments and Reply Comments on the Notice, the National Emergency Number Association (“NENA”) demonstrated that the FCC’s hopes for states to “act expeditiously” were not being realized. It referred to a “solution summary” from June 2004 representing an economical fix to the problem of locating callers behind PBXs. (Comments, 2/28/05). Such a model was particularly important, NENA suggested, given the wide variations in state actions until then. (Reply Comments, 3/29/05)

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<sup>1</sup> Enhanced 911 or E911 refers to the addition to a traditional 911 call of selective routing to the appropriate PSAP, and automatic delivery of location-specific and call-back information, permitting more efficient and speedy response by emergency service personnel.

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Now comes the tragic word of a death in a Gaithersburg, MD office of MedImmune. The attached news report appears to be a classic case of misrouting help to the site of the MLTS equipment in a multi-building complex, rather than to the site of the caller. The report also leads lay readers to believe that the “error . . . in the technology of the company phone system” is inherent and difficult to fix. Not so.

In concluding its Reply Comments a year ago, NENA said:

The variations in state action, and the absence of action in the vast majority of jurisdictions, are acknowledged by the Commission to be serious gaps in the emergency calling system. In the gaps, tragedy may strike and be compounded at any time. NENA urges the FCC to provide the federal guidance that will make state legislative and regulatory efforts less contentious, more uniform and thereby more affordable. (Emphasis added)

The FCC must not continue to leave this problem solely to the states. Please direct any questions to the undersigned.

Sincerely,

James R. Hobson  
Counsel for NENA

cc: Thomas Navin, FCC

April 21, 2006

WASHINGTON (AP) - A Bangladeshi immigrant was found dead at his Gaithersburg, Maryland, office in ten hours after he called emergency services saying he needed medical help.

Kaafee Billah, 39, phoned for help 40 minutes after he started work at the medical company MedImmune Inc. on Tuesday morning but almost ten hours passed before somebody found him lying on the floor of his office, the Washington Post reported Friday.

Police said that an apparent phone glitch sent medical personnel to the wrong address and, finding nothing amiss, they believed the call was unfounded.

"There is no way at this time to say if he would have survived the event if rescue personnel had reached him in a timely manner," the police officer who documented his death wrote in a preliminary report. "The error is in the technology of the company phone system."

A spokesman for the Montgomery County's Fire and Rescue Service said that Billah was not able to provide an address when he called.

When emergency dispatchers are unable to get an exact location, they tried to track down the information and find the person who called. A dispatcher sent medical help to the address determined by computerized caller identification ,which turned out to be a different MedImmune building in the area.

A police spokesman said that emergency calls from corporate phone systems are sometimes traced to the wrong location because phone lines in multiple buildings are traced to a single address.

Billah's body was found after emergency services received another call, this time from a worker at the building in which the man's office was located.

Billah was an immigrant from Bangladesh who received a PhD in agricultural economics from Cornell University in 2002.

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